

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

INFOGATION CORPORATION

Plaintiff

v.

TOYOTA MOTOR CORPORATION ET AL

Defendants

Civil Action No. 2:23-CV-359-JRG

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO MOVE, ANSWER OR
OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT AND
WAIVER OF FOREIGN SERVICE REQUIREMENT**

Defendants Toyota Motor Corporation, Toyota Motor North America, Inc., Toyota Motor Engineering & Manufacturing North America, Inc. and Toyota Motor Sales, U.S.A., Inc. (collectively “Toyota” or “Defendants”), without waiving any defenses described or referred to in Rule 12 F.R.C.P., move the Court to extend the time within which Defendants are required to move, answer or otherwise respond to Plaintiff’s Complaint for Patent Infringement. In support of their Motion, Defendants state as follows:

1. On August 2, 2023, Plaintiff filed its Complaint alleging patent infringement against Toyota.

2. Defendants Toyota Motor North America, Inc., Toyota Motor Engineering & Manufacturing North America, Inc. and Toyota Motor Sales, U.S.A., Inc. were served with Plaintiff’s Complaint on October 30, 2023, making their answer date November 20, 2023.

3. Defendants request an extension of time for Defendants Toyota Motor Corporation, Toyota Motor North America, Inc., Toyota Motor Engineering & Manufacturing North America, Inc. and Toyota Motor Sales, U.S.A., Inc. to move, answer or otherwise respond to the complaint until January 29, 2024 (90-days from Toyota Motor North America, Inc., Toyota Motor Engineering & Manufacturing North America, Inc. and Toyota Motor Sales, U.S.A., Inc.'s service date) in exchange for Toyota Motor Corporation's (a foreign corporation) agreement to waive formal service of process and consent to service in the action.

WHEREFORE, Defendants respectfully request that the time in which they are required to move, answer or otherwise respond to Plaintiff's Complaint for Patent Infringement be extended up to and through January 29, 2024.

Dated: November 16, 2023

Respectfully submitted,

/s/ Deron R. Dacus
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Attorney for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 16th day of November, 2023.

/s/ Deron R. Dacus
Deron R. Dacus

CERTIFICATE OF CONFERENCE

The undersigned certifies that Defendants' counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that the foregoing motion is unopposed.

/s/ Deron R. Dacus
Deron R. Dacus